

REGION 1 TRANSLATOR ASSOCIATION

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Federal Communications Commission
Washington DC 20554

RE: RM-10995

To: The Commission

Region 1 Translator Association (Region 1) fully supports the Petition of the National Translator Association for Amendment of Part 74 of the Commission's Rules to Provide For Displacement Relief for FM Translator Stations.

Region 1 is a government entity existing at the pleasure of the Boards of County Commissioners of Phillips, Sedgwick, and Yuma Counties of Colorado. It was created initially to provide free over-the-air TV for this vast area of northeastern Colorado where no reliable TV service existed. For 25 years, Region 1's seven (7) transmitter sites and 40 transmitters with more under construction have served well this area of rural America. The Commission's TV Displacement Rules have been extraordinarily important maintaining this system's functionality.

Twelve years ago it became clear that there was no reliable non-commercial FM radio service in the area nor was any likely in the foreseeable future; a factor that still has not changed. There are sufficient commercial stations. Region 1 worked with KUNC-FM (then associated with the University of Northern Colorado) by providing tower space and other assistance to extend their coverage into Yuma County. Region 1 obtained a Federal PTFP Grant (NTIA) to help finance this installation and three additional FM translators and ancillary equipment.

Region 1 constructed these new FM Translators at strategic locations using existing TV transmitter sites so that not only were Region 1's three (3) counties covered but at least portions of surrounding counties in Colorado, Kansas, and Nebraska. Our citizens have come to rely on these translators during the past 10 years for the unique programming of non-commercial KUNC-FM. Now, however, that service is threatened.

For example, one of the current FM channels being auctioned (228, Paxton, NE, Class C1), when constructed, most certainly will require Region 1's cochannel Wray transmitter to go off-air due to mutual interference. Not only is Wray the county seat, but this transmitter covers one of the more isolated areas of

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Southeast Yuma County. Additionally, a third adjacent channel only 42 km from Wray is to be auctioned at the same time.

Our remedies under current FM rules to displace this transmitter are minimal at best. While, Region 1's other channels are not immediately threatened, we have noted that additional full power FM stations and/or modifications are on the increase and we can easily see the possibility for displacement of one or more of these in the future.

Therefore, Region 1 Translator Association believes that the Petition of the National Translator Association for Amendment of Part 74 of the Commission's Rules to Provide For Displacement Relief for FM Translator Stations is in the public interest and should be adopted with maximum flexibility for translators to continue to provide programming as local areas see fit.

Respectfully submitted,

Region 1 Translator Association

by: John F. Rietz
Chief Engineer

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